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2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF CALIFORNIA
4 FRESNO DIVISION

5 RANDY SCOTT JONES,

6 Plaintiff,

7 vs.

8 ANDREW SAUL,
9 Commissioner of Social Security,

10 Defendant.

) Case No.: 1:20-cv-00462-GSA

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) **DEFENDANT'S UNOPPOSED MOTION**

) **FOR EXTENSION OF TIME (SECOND)**

) **AND ORDER**

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) **(Doc. 18)**

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12 Defendant moves for an extension of time to file his response to Plaintiff's letter brief.
13 The current due date is May 5, 2021. The new date will be June 4, 2021. All other deadlines will
14 extend according to the Court's Scheduling Order dated April 1, 2020, Docket no. 5. Plaintiff's
15 counsel has been contacted and he has no objection to this request.

16 Defense counsel needs an extension of time because she is taking extended leave to care
17 for the emotional, physical, and scholastic needs of her two her young children who are unable to
18 return to school or childcare fulltime due to various stay-at-home orders or school policies as a
19 result of the pandemic. In addition, defense counsel needs more time to consider the issues in
20 Plaintiff's letter brief, determine whether options exist for settlement, and draft the response.

21 This request is made in good faith with no intention to delay unduly the proceedings.

22 This is Defendant's second request for an extension.

23 Respectfully submitted,

24 Dated: May 5, 2021

25 PHILLIP A. TALBERT
26 Acting United States Attorney
27 DEBORAH LEE STACHEL
28 Regional Chief Counsel, Region IX
Social Security Administration

By: /s/ S. Wyeth McAdam

1 S. WYETH McADAM
2 Special Assistant United States Attorney
3 Attorneys for Defendant
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5 ORDER

6 GOOD CAUSE APPEARING, IT IS SO ORDERED. DEFENDANT SHALL FILE HIS
7 RESPONSE TO PLAINTIFF'S LETTER BRIEF ON OR BEFORE JUNE 4, 2021.
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9 IT IS SO ORDERED.

10 Dated: May 5, 2021

11 /s/ Gary S. Austin
12 UNITED STATES MAGISTRATE JUDGE
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